

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

MAPLEBEAR, INC., D/B/A	§	
INSTACART,	§	
	§	CIVIL ACTION NO. 25-CV-00137-
Plaintiff,	§	SHE-MTS
	§	
v.	§	
	§	<u>JURY TRIAL DEMANDED</u>
FALL LINE PATENTS, LLC,	§	
	§	
Defendant.	§	

**Declaration Of Matthew J. Antonelli In Support
Of Defendant's Opposition To Plaintiff's Motion
To Dismiss Defendant's Counterclaims**

I, Matthew J. Antonelli, am a member of the bars of the states of Texas and New York and have been admitted *pro hac vice* to this Court for the purpose of this action. I am one of the attorneys representing Fall Line Patents, LLC. I make this declaration based on my personal knowledge and, if called as a witness, I could and would competently testify to the matters set forth herein.

1. Attached hereto as Exhibit 1 is a true and correct copy of an order from *Fall Line Patents, LLC. v. Zoe's Kitchen, Inc.*, Case No. 6:18-cv-00407-RWS, Dkt. No. 151 (E. D. Tex.), that was issued on May 25, 2021.

2. Attached hereto as Exhibit 2 is a true and correct copy of an order from *Fall Line Patents, LLC. v. Zoe's Kitchen, Inc.*, Case No. 6:18-cv-00407-RWS, Dkt. No. 336-1 (E. D. Tex.), that was issued on July 7, 2023.

3. Attached hereto as Exhibit 3 is a true and correct copy of the Expert Report Of Dr. Samuel H. Russ Concerning Validity Of U.S. Patent No. 9,454,748, which was submitted by Dr. Russ on January 31, 2023.

4. Attached hereto as Exhibit 4 is a true and correct copy of an excerpt of Instacart's 10-K for the fiscal year ended 2024.

5. Attached hereto as Exhibit 5 is a true and correct copy of search results returned by Google when I typed "instacart mobile app" into the Google search bar.

6. Attached hereto as Exhibit 6 is a true and correct copy of a declaration executed on April 2, 2025, by Stephen Munday, a Staff Software Engineer for Maplebear, Inc. d/b/a Instacart and filed in *Fall Line Patents, LLC. v. Sprouts Farmers Market, Inc.*, Case No. 5:24-cv-182-RWS (E. D. Tex.). at Dkt. No. 28-3.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 28, 2025.

/s/ Matthew J. Antonelli
Matthew J. Antonelli

CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of July 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Matthew Antonelli
Matthew Antonelli